

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

OSCAR YANES, GAGIK MKRTCHIAN,
and WENDELL BAEZ LOPEZ, on behalf
of themselves and all those similarly situated,

Petitioners-Plaintiffs,

-v.-

DANIEL W. MARTIN, Warden, Donald
W. Wyatt Detention Facility; CHAD F.
WOLF, Acting Secretary, U.S. Department
of Homeland Security; MATTHEW T.
ALBENCE, Acting Director, U.S.
Immigration and Customs Enforcement;
TODD M. LYONS, Acting Field Office
Director, U.S. Immigration and Customs
Enforcement; and CENTRAL FALLS
DETENTION FACILITY
CORPORATION,

Respondents-Defendants.

Civil Action No.

20-CV-216-MSM-PAS

**NOTICE OF FILING OF SUPPLEMENTAL BAIL SUBMISSION REGARDING
DETAINEE ERNESTO SAM GONZALES**

The Federal Respondents respectfully submit the attached Exhibit, which are additional, underlying materials relevant to the Court's determination of whether bail is appropriate for detainee Ernesto Sam Gonzales. The Federal Respondents are providing these materials as soon as practicable so that they are available to the Court and to counsel for Petitioners in advance of this bail hearings for this detainee, and respectfully request that the Court deem them timely filed, *nunc pro tunc*, in supplementation of their opposition (Docket No. 101).

Attachment:	Description of Exhibit
1	Ex. 1 - Bond Order - Ernesto Sam Gonzales - 216305146
2	Ex. 2 - Gonzales 10-6-19 NCO
3	Ex. 3 - I-213 - ERNESTO SAM GONZALES
4	Ex. 4 - NCO10-26
5	Ex. 5 - Register of Actions - 61-2019-11242
6	Ex. 6 - Register of Actions - 61-2019-12045
7	Ex. 7 - Removal Order and IJ Decision - Ernesto Sam Gonzales - 216305146
8	Ex. 8 - Witness Statement 10_25_2019
9	Ex. 9 - Police Reports Criminal Documents - ERNESTO SAM GONZAELS - 216305146

Dated: Providence, Rhode Island
June 18, 2020

Respectfully submitted,

AARON L. WEISMAN
United States Attorney

By: /s/ Richard B. Myrus

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CERTIFICATE OF SERVICE

I hereby certify that, on June 18, 2020, I caused the foregoing document to be filed by means of this Court's Electronic Case Filing (ECF) system, thereby serving it upon all registered users in accordance with Federal Rule of Civil Procedure 5(b)(2)(E) and Local Rules Gen 305 and 309(b).

By: /s/ Richard B. Myrus
Richard B. Myrus
Assistant United States Attorney